

The background image shows a modern building with a glass facade and a traditional brick building. The modern building is white with large glass windows and a flat roof. The brick building is multi-story with a gabled roof and many windows. The text "Group Legionella Management Policy" is overlaid in the center in a bold, dark red font.

Group Legionella Management Policy

Approved: May 2026

Shettleston Housing Group

Shettleston Housing Group (SHG) comprises:

Parent :

Shettleston Housing Association Limited (SHA)

- Registered Scottish Charity, No. SC036687
- Registered with the Scottish Housing Regulator under the Housing (Scotland) Act 2010, No. 183
- Registered under the Co-operative and Community Benefits Act 2014, Registered No. SP1884RS
- Property Factor Registered No. PF000226
- Authorised by the Financial Conduct Authority, No. FRN730115

Subsidiary Companies :

Upkeep Shettleston Community Enterprise Limited (Upkeep)

- Company Registration No. SC277511 (Scotland)

East End Housing Development Company Limited (EEHDC)

- Company Registration No. SC293302 (Scotland)

Our Vision, Mission Statement and Values

Vision Statement

Thriving and prosperous local communities where all residents enjoy great homes and services, an attractive physical environment, and good life chances.

This statement is the foundation for Shettleston Housing Association's commitment to its residents and the communities they live in. This commitment is also demonstrated in the Association's values which were agreed following discussions with the Board and staff. Shettleston's values are fundamental to how we carry out our day-to-day activities.

Our values are:

Customer service | Make a difference in the community | Teamwork | Fairness

Equality & Diversity Statement

We will ensure that this strategy is applied fairly and consistently. In implementing this strategy, we will not directly or indirectly discriminate against any person or group of people because of their race, religion/faith, gender, disability, age, sexual orientation or any other grounds. Our commitment to equal opportunities and fairness will apply irrespective of factors such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or other personal attributes.

This strategy and any other SHG publications is available in other formats e.g. other languages, Braille, large print, audio.

Legionella Management Policy

1. Purpose of the Policy

This policy sets down Shettleston Housing Group's (SHG's) approach to the effective inspection, maintenance and management of all water systems within premises controlled by SHG. The terms and guidance in this document are relevant to all staff employed by SHG, to contractors/subcontractors engaged by the organisation and to tenants and occupants of SHG premises. The procedures detailed within this policy have been written to ensure all reasonable steps have been taken to comply with The Control of Substances Hazardous to Health Regulations 2002 (as amended), the Water Supply (Water Fittings) (Scotland) Byelaws 2014 and all other relevant legislation.

2. Introduction

SHG attaches great importance to ensuring the safety of its tenants, their families, visitors and the general public. This policy outlines how the Association will carry out its legal responsibilities in terms of water systems and legionella in housing stock and common areas.

The aim of this Policy is to ensure the effective inspection, maintenance and management of all water systems within premises controlled by SHG.

3. Legal Framework

SHG will take all relevant steps to comply with the following legislation and best practice requirements:

- The Health and Safety at work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Control of Substances Hazardous to Health (COSHH) Regulations 2002, as amended
- British Standard BS 8580-1:2019 Water quality - risk assessments for Legionella control - Code of practice
- Technical Guidance HSG 274 Legionnaires Disease – Technical Guidance Parts 1, 2 & 3
- INDG 458 Legionnaires Disease – A brief Guide for Duty Holders
- AOCPL8 (fourth edition) HSE Approved Code of Practice: The Control of Legionella Bacteria
- AOCPL5 (6th Edition) – Control of Substances Hazardous to Health. Approved Code of Practice & Guidance
- INDG136 (Rev5) – Working with substances hazardous to health: A brief guide to COSHH

4. Roles and Responsibilities

4.1 SHG Responsibilities

SHG's Board of Management has overall responsibility for the oversight of the maintenance and management of homes and non-domestic premises to ensure compliance with resident safety and more general health & safety requirements across the organisation. It is important that the Board has a good level of assurance about the effectiveness of the management of legionella risks within its premises. This is achieved through operational oversight of these issues that is delegated to the Operations sub-Committee (for Association managed properties); EEHDC Board (for mid-market and private rented homes managed by EEHDC) and Upkeep Board (in connection with safety of the workforce).

The Chief Executive has overall responsibility for the management of health and safety across SHG and has oversight of the policy and procedures relating to legionella management. The CEO will, in conjunction with the Duty Holder, monitor performance on issues arising in connection with legionella to ensure standards are being met.

The Director of Property Services (DPS) is responsible for the oversight and implementation of the legionella management systems within SHG. The DPS has a responsibility to ensure that SHG carries out its duties with regard to the Management of Health and Safety at Work Regulations (MHSWR) 1999 and the Control of Substances Hazardous to Health (COSHH) 2002 and will ensure that policies and procedures are established and maintained that, as far as possible, will protect building occupants and those working within them from potential harm from legionella risks.

The DPS will ensure that all staff and Board members within SHG are aware of their responsibilities and the responsibilities of others under the terms of relevant Legionella management legislation.

The Property Services Manager (PSM) is the organisations allocated 'responsible person' with delegated authority for the day-to-day operation of the Legionella Management Plan, including managing the control of any identified risk from legionella bacteria and monitoring adherence to policy and procedures by SHG staff and contractors.

Upkeep's Head of Operations (HOp) has a responsibility to ensure all Upkeep staff maintain an awareness of the risks associated with legionella bacteria and will monitor adherence to the Legionella Management Policy by Upkeep staff.

All SHG staff have a responsibility to ensure they remain alert to the risks presented by Legionella in premises and follow the approved policy and procedures.

4.2 Tenant Responsibilities

Tenants will be provided with information on good water management and Legionella control through tenancy agreements and/or by means of newsletters and SHG's website.

Tenants are advised to clean shower heads, descale and disinfect them at least every two months.

For showers that are only occasionally used, tenants are advised to flush the shower through by running the water for at least 2 minutes once a week.

Where a property is left vacant for any time (e.g. when on holiday), tenants are advised to flush both hot and cold water systems by running all outlets for at least two minutes.

Tenants should inform SHG immediately if there are problems, debris or discolouration in the water.

5. Principles of Legionella Management

SHG has several specific legal duties that relate to water safety and, in particular, Legionella risk management. These include:

- Identifying and assessing sources of risk of Legionella
- Where possible, eliminating any risk from Legionella
- Preparing a scheme for preventing or controlling the risk where it cannot be eliminated or water systems restricted
- Implementing and managing procedures to minimise risk
- Keeping records and checking what has been done is effective

Legionella bacteria is common in natural water (such as rivers and ponds). However, legionella can grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold water systems.

Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of Legionella bacteria. This includes the most serious Legionnaires' diseases, as well as the similar but less serious conditions of Pontiac Fever and Lochgoilhead Fever. The bacteria is normally contained within fine water droplets (aerosol) that may be caused by operating a cooling tower, shower, spray apparatus, running a tap outlet or operating a humidifier.

Legionnaires' disease has the potential to affect anybody. However, those more susceptible are normally in the age range of 45 and above, smokers, heavy drinkers, or suffer from chronic respiratory or kidney disease or have impaired immune systems.

Legionella bacteria survive low temperatures and thrive at temperatures between 20-45 degrees C if the conditions are right (e.g. if a supply of nutrients is present such as rust, sludge, scale and other bacteria).

SHG will aim to minimise and control potential risk from Legionnaires' disease and, to this end, will:

- Appoint a responsible person who will have a duty to put in place an action plan to minimise the risk of Legionella and to manage and monitor the necessary work systems and procedures.
- Identify and assess sources of risk (e.g. where conditions are present that may encourage Legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets), and establish any items of non-compliance.
- Assess the level of risk through a structured Legionella Risk Assessment programme and aim to eliminate or reduce the risk to an acceptable level.
- Arrange for routine inspection and maintenance of water systems and, where needed, a programme of disinfection.
- Retain records of maintenance, inspection and testing for a minimum of 5 years

6. Risk Assessment

SHG will undertake a programme of risk assessments to identify and assess the risk of exposure to Legionella bacteria from all water systems across its property portfolio. A representative sample of properties will be assessed to ensure robust knowledge across all property types.

Assessment will consider potential risk or change in risk potential from:

- Existing water tanks and associated pipework
- Dead-legs on pipework or other high risk hardware in the plumbing system
- High risk events such as the property becoming void
- Any required cleaning and/or maintenance events (e.g. shower heads)

SHG will appoint a competent external company with qualified Legionella Risk Assessors to carry out the risk assessment programme. The assessment company will not normally be associated with a water hygiene/control contracting company in an attempt to ensure independent recommendations are given by the Assessor. The Assessors and SHG will determine an appropriate programme of risk assessing, which may involve the use of 'representative' assessments followed by an ongoing programme or rotation across different addresses.

All recommendations and remedial actions taken will be recorded in SHG's central property database. The recommendations will also highlight the management control actions that may be carried out in-house and those which would require an external contractor.

The risk assessment will be reviewed at regular intervals (at least every 2 years) or when it is believed that the original risk assessment is no longer valid (e.g. following a change in the building or water supply or following an incident).

7. Management of Remedial Actions

Following completion of Legionella Risk Assessments, all identified remedial actions will be formally recorded, prioritised and managed through a structured action plan.

Remedial actions will be risk-rated (high, medium, low) based on the potential impact on health and safety and in accordance with guidance contained within L8 and HSG274. SHG will ensure that:

- **High-risk actions** are addressed as a matter of urgency within defined timescales.
- **Medium and low-risk actions** are programmed and completed within reasonable and proportionate timescales.
- All actions are tracked to completion via the centralised property management system.

Responsibility for overseeing remedial works will sit with the Property Service Manager, who will ensure works are allocated to competent contractors or appropriately trained in-house staff. Progress against remedial actions will be reviewed regularly, and any overdue actions will be escalated through management reporting procedures.

8. Written Scheme of Control

A written scheme of control will be developed and maintained for all relevant water systems identified as presenting a foreseeable risk. The written scheme will include:

- A schematic or description of the water system.
- Identification of key risk points (storage tanks, dead-legs, infrequently used outlets.)
- Control measures to minimise risk (temperature control, flushing regimes, etc.)
- Monitoring requirements and frequencies.
- Responsibilities for implementing control measures.
- Corrective actions to be taken where control limits are not achieved.

The scheme will be specific to property types where required (e.g. communal systems, HMOs, office premises) and will be reviewed in line with risk assessment reviews or following significant changes.

9. Water Fittings and System Requirements

SHG will ensure that all water fittings comply with relevant legislation and have the CE mark, British Standard kitemark or appropriate equivalent. Specialist advice will be obtained in the selection of all water systems fixtures and fittings, where required.

SHG will ensure that all water fittings are suitable for the purpose intended:

- Hot water will be stored in tanks at a temperature of at least 60°C.
- Water pipes will be as short and direct as possible, and pipes and tanks will be effectively insulated. Tanks will be protected against contamination and materials used which do not encourage Legionella growth.
- Hot water will reach taps at temperatures greater than 50°C within 1 minute of running.
- Cold water will be stored at a temperature of less than 20°C. Cold water will reach taps at temperatures less than 20°C within 2 minutes of running.
- All little used outlets will be routinely flushed through.
- Where water is used or stored for consumption in any devices, e.g. water coolers, tea urns, etc., an effective system of regular cleaning and disinfecting will be introduced, in accordance with manufacturer's instructions and relevant British Standards.

Thermostatic Mixing Valves (TMVs)

Where Thermostatic Mixing Valves (TMVs) are installed, SHG recognises the need to balance scalding risk with Legionella control. TMVs will be:

- Installed where required to control outlet temperatures, particularly in higher-risk environments
- Included within the Legionella Risk Assessment process.
- Subject to a planned programme of inspection, maintenance and testing.

A suitable regime will be implemented by SHG that includes:

- Annual servicing and fail-safe testing of TMVs, where access provided.
- Routine temperature checks to ensure correct operation.
- Cleaning, descaling, or replacement where performance is compromised records of all TMV inspections, tests and maintenance will be retained within the central property database.

Where TMVs are not installed, a risk-based approach will be taken to ensure outlet temperatures do not pose a scalding risk while maintaining compliance with Legionella control standards.

Disinfection

Water services will be disinfected when any of the following situations occur:

- If a routine inspection or risk assessment shows it is necessary to do so.

- After any prolonged shutdown of a month or longer (a risk assessment may indicate the need for cleaning after a period of less than one month, especially in summer where temperatures have been high).
- If the system or part of it has been substantially altered or entered for maintenance purposes in a manner that may lead to contamination.
- Following an outbreak or suspected outbreak of Legionnaires' disease or any other water borne infection/disease.

10. Void Property Actions

It is recognised that all void properties have the potential to exhibit increased risk of Legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods. To mitigate the increased potential risk associated with voids, the contractor appointed to carry out repair and re-decoration works on all standard properties will carry out and record the following:

- Thoroughly flush all outlets on a weekly routine until the property is relet.
- Clean and disinfect, or replace, all shower heads and hoses.
- Inspect and report on water storage tank, where present.

11. Positive Legionella Results

Where sampling identifies the presence of Legionella bacteria SHG will:

- Review the result in context, considering colony counts, system type, and risk profile of occupants.
- Undertake a risk-based assessment to determine the level of response required in line with HSG274 guidance thresholds.
- Initiate immediate control measures where required, which may include:
 - Restricting use of outlets
 - Increasing flushing regimes
 - Temperature adjustments

Before any disinfection is undertaken SHG will ensure that:

- Representative sampling has been completed to confirm the extent and source of contamination.
- Sampling includes outlets and relevant parts of the system (e.g. tanks, calorifiers).
- Results are reviewed by a competent person or specialist contractor.

Investigation and Root Cause Analysis

A full investigation will be undertaken to identify the cause of the contamination. This may include:

- Review of the Legionella Risk Assessment.
- Examination of temperature records and monitoring logs.
- Inspection of system condition (e.g. presence of scale, sludge, dead-legs).
- Review of maintenance and control regimes.

Findings will be documented and corrective actions implemented to prevent recurrence.

Remedial Actions and System Control

Following confirmation of contamination:

- A programme of remedial works will be developed and implemented (e.g. removal of dead-legs, tank cleaning, system upgrades).
- Disinfection (e.g. chlorination or thermal treatment) will be carried out where appropriate.
- Post-remedial sampling will be undertaken to confirm the effectiveness of control measures.

All actions will be recorded and monitored through SHG's centralised property management system.

12. Outbreak Management

In the event of a suspected or confirmed outbreak of Legionnaires' disease associated with the Association's premises, the following actions will be taken:

- Immediate notification to relevant authorities, including:
 - Health and Safety Executive (HSE) under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
 - Local Authority Environmental Health
 - Public Health authorities
- Cooperation with investigating authorities, including provision of records, risk assessments, and access to premises
- Immediate implementation of control measures, which may include:
 - Isolating affected water systems
 - Shutting down or restricting use of outlets
 - Providing alternative water supplies where necessary

- Comprehensive sampling programme to support the investigation, undertaken before and after any disinfection works
- Appointment of specialist Legionella consultants where required to support outbreak management
- Communication with tenants, staff and stakeholders, providing clear and proportionate information and advice
- Ongoing review of control measures and implementation of any additional recommendations from enforcing authorities

Post-Outbreak Review

Following any incident SHG will:

- Conduct a full review of the Legionella management system.
- Update risk assessments and written schemes of control as required.
- Identify lessons learned and implement improvements.
- Report findings to senior management and governing body where appropriate.

13. Contractors

SHG will utilise only suitably qualified and competent contractors to carry out preventative legionella monitoring and water hygiene services. Contractors are required to be a registered member of the Legionella Control Association (LCA) or the Water Management Society (WMSoc), or similar. Contracted works may include legionella sampling, tank inspections, water sampling, (for all bacteria) and other associated services, as identified in the Legionella Risk Assessment programme.

Upkeep currently delivers these services on behalf of SHG and will maintain relevant training, registration and insurance records for all staff involved in undertaking legionella control works.

14. Training and Competency

SHG will ensure that all staff involved in the management, monitoring or control of water systems are suitably trained and competent for their roles.

This will include:

- Awareness training for relevant staff on Legionella risks and control measures
- Role-specific training for those responsible for implementing monitoring tasks (e.g. temperature checks, flushing regimes)
- Role specific training to meet the requirements of the registered body for those involved in delivering works to control the risk of legionella.
- Legionella management training for the Responsible Person and others involved in the oversight of the management of risk in line with current legislation and guidance (L8 and HSG274)

Training will be provided at induction where appropriate. Refresher training will also be provided to ensure knowledge remains current and in response to changes in legislation, guidance or internal procedures. Training records will be maintained and made available for audit and compliance purposes.

15. Monitoring & Reporting

Relevant testing will be recorded within the central property database (as outlined above) and this will be monitored on a quarterly basis by the PSM.

Progress on ongoing Legionella testing across relevant properties will be reported quarterly to the Operations sub-Committee. Any significant issues arising in connection with legionella risk will be reported to SHG's Board of management, along with any required actions and any lessons learned.

The Legionella Policy will be reviewed every 3 years, or earlier as required to reflect any changes in legislation or best practice guidance.

16. Associated documents

This policy should be read in conjunction with the following associated documents:

- Maintenance Policy
- Code of Conduct for Contractors
- Group Asset Management Strategy